

EXHIBIT B

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANGELICA PARKER,

Plaintiff,

v.

TAL ALEXANDER, ALON ALEXANDER
and OREN ALEXANDER,

Defendants.

Case No.: 24-cv-04813

DECLARATION OF DEANNA M. PAUL

Pursuant to 28 U.S.C. § 1746(a), DEANNA M. PAUL declares as follows:

1. I am an attorney with Walden Macht & Haran LLP, and counsel to Defendant Tal Alexander. I make this declaration, based upon my personal knowledge, in support of Defendant Tal Alexander's removal of the civil action, *Parker v. Alexander et al.*, Index No. 155547/2024, (Sup. Ct. N.Y. Co.) (the "State Court Action"), to this Court based on diversity of citizenship.

2. On June 18, 2024, Plaintiff Angelica Parker ("Plaintiff") commenced the State Court Action by filing a Summons and Complaint.

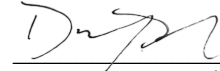
3. On June 21, 2024, I emailed Plaintiff's Counsel, Michael Willemin, of Wigdor LLP, and accepted service of the Summons and Complaint.

4. Mr. Willemin informed me that, prior to filing the Summons and Complaint, he spoke with Defendant Tal Alexander's former counsel and communicated that, if Plaintiff were to sue, she would seek damages in excess of \$75,000.

5. The jurisdictional predicate is also met pursuant to 28 U.S.C. § 1446(c)(2)(A), because the Complaint seeks nonmonetary relief.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 25, 2024



Deanna M. Paul